

**FILED**

**JAN 13 2021**

**U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

SUPPRESSED

UNITED STATES OF AMERICA, )  
v. )  
Plaintiff, )  
ANTONIO HUBBARD, )  
Defendant. )

**4:21CR0022 SEP/DDN**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about November 6, 2018, in the Eastern District of Missouri, the defendant,

**ANTONIO HUBBARD,**

knowingly and intentionally distributed fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a) and Title 18, United States Code, Section 2; and the death of J.L. resulted from the use of such controlled substance, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT TWO**

The Grand Jury further charges that:

On or about April 18, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**ANTONIO HUBBARD,**

knowingly and intentionally distributed fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**

The Grand Jury further charges that:

On or about April 25, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**ANTONIO HUBBARD,**

knowingly and intentionally distributed fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOUR**

The Grand Jury further charges that:

On or about May 9, 2019, in St. Louis County, within the Eastern District of Missouri, the defendant,

**ANTONIO HUBBARD,**

knowingly and intentionally distributed fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT FIVE**

The Grand Jury further charges that:

On or about May 15, 2019, in St. Louis County, within the Eastern District of Missouri, the defendant,

**ANTONIO HUBBARD,**

knowingly and intentionally possessed, with the intent to distribute, fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Counts I through V, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.
2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violations set forth in Counts I through V.
3. Specific property subject to forfeiture includes, but is not limited to, the following:
  - a. Approximately \$12,781.00 U.S. Currency; and
  - b. Approximately \$3,707.00 U.S. Currency.
4. If any of the property described above, as a result of any act or omission of the defendants:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty, the

United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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Special Assistant United States Attorney